

**STATISTICAL INFORMATION ONLY: Debtor must select the number of each of the following items included in the Plan.**  
0 Valuation of Security      0 Assumption of Executory Contract or Unexpired Lease      1 Lien Avoidance

Last revised: September 1, 2018

**UNITED STATES BANKRUPTCY COURT  
District of New Jersey**

In Re:      Jamie M Fletcher  
                  Christopher S Fletcher

Case No.: \_\_\_\_\_  
Judge: \_\_\_\_\_

Debtor(s)

**CHAPTER 13 PLAN AND MOTIONS**

Original  
 Motions Included

Modified/Notice Required  
 Modified/No Notice Required

Date: \_\_\_\_\_

THE DEBTOR HAS FILED FOR RELIEF UNDER  
CHAPTER 13 OF THE BANKRUPTCY CODE.

**YOUR RIGHTS MAY BE AFFECTED**

You should have received from the court a separate *Notice of the Hearing on Confirmation of Plan*, which contains the date of the confirmation hearing on the Plan proposed by the Debtor. This document is the actual Plan proposed by the Debtor to adjust debts. You should read these papers carefully and discuss them with your attorney. Anyone who wishes to oppose any provision of this Plan or any motion included in it must file a written objection within the time frame stated in the *Notice*. Your rights may be affected by this plan. Your claim may be reduced, modified, or eliminated. This Plan may be confirmed and become binding, and included motions may be granted without further notice or hearing, unless written objection is filed before the deadline stated in the *Notice*. The Court may confirm this plan, if there are no timely filed objections, without further notice. See Bankruptcy Rule 3015. If this plan includes motions to avoid or modify a lien, the lien avoidance or modification may take place solely within the chapter 13 confirmation process. The plan confirmation order alone will avoid or modify the lien. The debtor need not file a separate motion or adversary proceeding to avoid or modify a lien based on value of the collateral or to reduce the interest rate. An affected lien creditor who wishes to contest said treatment must file a timely objection and appear at the confirmation hearing to prosecute same.

**The following matters may be of particular importance. Debtors must check one box on each line to state whether the plan includes each of the following items. If an item is checked as "Does Not" or if both boxes are checked, the provision will be ineffective if set out later in the plan.**

THIS PLAN:

DOES  DOES NOT CONTAIN NON-STANDARD PROVISIONS. NON-STANDARD PROVISIONS MUST ALSO BE SET FORTH IN PART 10.

DOES  DOES NOT LIMIT THE AMOUNT OF A SECURED CLAIM BASED SOLELY ON VALUE OF COLLATERAL, WHICH MAY RESULT IN A PARTIAL PAYMENT OR NO PAYMENT AT ALL TO THE SECURED CREDITOR. SEE MOTIONS SET FORTH IN PART 7, IF ANY.

■ DOES  DOES NOT AVOID A JUDICIAL LIEN OR NONPOSSESSORY, NONPURCHASE-MONEY SECURITY INTEREST. SEE MOTIONS SET FORTH IN PART 7, IF ANY.

Initial Debtor(s)' Attorney SDH Initial Debtor: JMF Initial Co-Debtor CSF

### Part 1: Payment and Length of Plan

a. The debtor shall pay \$525.00 Monthly for 36 months to the Chapter 13 Trustee, starting on 09-01-2018 for approximately 36 months.

b. The debtor shall make plan payments to the Trustee from the following sources:

- Future Earnings
- Other sources of funding (describe source, amount and date when funds are available):

c. Use of real property to satisfy plan obligations:

- Sale of real property  
Description: \_\_\_\_\_  
Proposed date for completion: \_\_\_\_\_
- Refinance of real property:  
Description: \_\_\_\_\_  
Proposed date for completion: \_\_\_\_\_
- Loan modification with respect to mortgage encumbering property:  
Description: 3 Carroll Court, Sicklerville, NJ 08081  
The Debtor/s will file a Notice of Request for Loss Mitigation with the Bankruptcy Court for the Debtor/s mortgage serviced by Select Portfolio Servicing, Inc.  
The Plan provides for payment of \$10,000.00 in pre-petition arrears to the servicer and/or its assignees.  
Proposed date for completion: 12-31-2018

d.  The regular monthly mortgage payment will continue pending the sale, refinance or loan modification.

e.  Other information that may be important relating to the payment and length of plan:

### Part 2: Adequate Protection

**NONE**

a. Adequate protection payments will be made in the amount of \$\_\_\_\_ to be paid to the Chapter 13 Trustee and disbursed pre-confirmation to \_\_\_\_ (creditor).

b. Adequate protection payments will be made in the amount of \$ 1,900.00 monthly to be paid directly by the debtor(s) outside the Plan, pre-confirmation to: Select Portfolio Servicing (creditor).

### Part 3: Priority Claims (Including Administrative Expenses)

a. All allowed priority claims will be paid in full unless the creditor agrees otherwise:

Creditor	Type of Priority	Amount to be Paid
Isabel C. Balboa, Esq. Trustee	Administrative	1,890.00
S. Daniel Hutchison, Esq. SH-6931	Attorney Fees	4,750.00

b. Domestic Support Obligations assigned or owed to a governmental unit and paid less than full amount:  
Check one:  
 None  
 The allowed priority claims listed below are based on a domestic support obligation that has been assigned to or is owed to a governmental unit and will be paid less than the full amount of the claim pursuant to 11 U.S.C.1322(a)(4):

Creditor	Type of Priority	Claim Amount	Amount to be Paid
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#### **Part 4: Secured Claims**

##### **a. Curing Default and Maintaining Payments on Principal Residence: **NONE****

The Debtor will pay to the Trustee (as part of the Plan) allowed claims for arrearages on monthly obligations and the debtor shall pay directly to the creditor (outside the Plan) monthly obligations due after the bankruptcy filing as follows:

Creditor	Collateral or Type of Debt	Arrearage	Interest Rate on Arrearage	Amount to be Paid to Creditor (In Plan)	Regular Monthly Payment (Outside Plan)
Select Portfolio Servicing	3 Carroll Court Sicklerville, NJ	10,000.00	0.00	10,000.00	1,900.00

##### **b. Curing and Maintaining Payments on Non-Principal Residence & other loans or rent arrears: **NONE****

The Debtor will pay to the Trustee (as part of the Plan) allowed claims for arrearages on monthly obligations and the debtor will pay directly to the creditor (outside the Plan) monthly obligations due after the bankruptcy filing as follows:

Creditor	Collateral or Type of Debt	Arrearage	Interest Rate on Arrearage	Amount to be Paid to Creditor (In Plan)	Regular Monthly Payment (Outside Plan)

##### **c. Secured claims excluded from 11 U.S.C. 506: **NONE****

The following claims were either incurred within 910 days before the petition date and are secured by a purchase money security interest in a motor vehicle acquired for the personal use of the debtor(s), or incurred within one year of the petition date and secured by a purchase money security interest in any other thing of value:

Name of Creditor	Collateral	Interest Rate	Amount of Claim	Total to be Paid through the Plan Including Interest Calculation

##### **d. Requests for valuation of security, Cram-down, Strip Off & Interest Rate Adjustments **NONE****

1.) The debtor values collateral as indicated below. If the claim may be modified under Section 1322(b)(2), the secured creditor shall be paid the amount listed as the "Value of the Creditor Interest in Collateral," plus interest as stated. The portion of any allowed claim that exceeds that value shall be treated as an unsecured claim. If a secured claim is identified as having "NO VALUE" it shall be treated as an unsecured claim.

**NOTE: A modification under this section ALSO REQUIRES  
the appropriate motion to be filed under Section 7 of the Plan.**

Creditor	Collateral	Scheduled Debt	Total Collateral Value	Superior Liens	Value of Creditor Interest in Collateral	Annual Interest Rate	Total Amount to Be Paid
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2.) Where the Debtor retains collateral and completes the Plan, payment of the full amount of the allowed secured claim shall discharge the corresponding lien.

**e. Surrender  NONE**

Upon confirmation, the stay is terminated as to surrendered collateral only under 11 U.S.C. 362(a) and that the stay under 11 U.S.C. 1301 be terminated in all respects. The Debtor surrenders the following collateral:

Creditor	Collateral to be Surrendered	Value of Surrendered Collateral	Remaining Unsecured Debt
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**f. Secured Claims Unaffected by the Plan  NONE**

The following secured claims are unaffected by the Plan:

Creditor

**g. Secured Claims to be Paid in Full Through the Plan  NONE**

Creditor	Collateral	Total Amount to be Paid through the Plan
Winslow Township	3 Carroll Court Sicklerville, NJ	1,907.69

**Part 5: Unsecured Claims  NONE**

**a. Not separately classified** allowed non-priority unsecured claims shall be paid:

- Not less than \$\_\_\_\_ to be distributed *pro rata*
- Not less than \_\_\_\_ percent
- Pro Rata* distribution from any remaining funds

**b. Separately classified unsecured** claims shall be treated as follows:

Creditor	Basis for Separate Classification	Treatment	Amount to be Paid
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**Part 6: Executory Contracts and Unexpired Leases  NONE**

(NOTE: See time limitations set forth in 11 U.S.C. 365(d)(4) that may prevent assumption of non-residential real property leases in this Plan.)

All executory contracts and unexpired leases, not previously rejected by operation of law, are rejected, except the following, which are assumed:

Creditor	Arrears to be Cured in Plan	Nature of Contract or Lease	Treatment by Debtor	Post-Petition Payment
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**Part 7: Motions  NONE**

**NOTE: All plans containing motions must be served on all potentially affected creditors, together with local form, *Notice of Chapter 13 Plan Transmittal*, within the time and in the manner set forth in D.N.J. LBR 3015-1. A *Certification of Service, Notice of Chapter 13 Plan Transmittal and valuation* must be filed with the Clerk of Court when the plan and transmittal notice are served.**

**a. Motion to Avoid Liens under 11 U.S.C. Section 522(f).  NONE**

The Debtor moves to avoid the following liens that impair exemptions:

Creditor	Nature of Collateral	Type of Lien	Amount of Lien	Value of Collateral	Amount of Claimed Exemption	Sum of All Other Liens Against the Property	Amount of Lien to be Avoided
Cambria Center LLC	3 Carroll Court Sicklerville, NJ	Judgment Lien	8,150.00	195,000.00	0.00	222,144.56	8,150.00

**b. Motion to Avoid Liens and Reclassify Claim from Secured to Completely Unsecured.  NONE**

The Debtor moves to reclassify the following claims as unsecured and to void liens on collateral consistent with Part 4 above:

Creditor	Collateral	Scheduled Debt	Total Collateral Value	Superior Liens	Value of Creditor's Interest in Collateral	Total Amount of Lien to be Reclassified

**c. Motion to Partially Void Liens and Reclassify Underlying Claims as Partially Secured and Partially Unsecured.  NONE**

The Debtor moves to reclassify the following claims as partially secured and partially unsecured, and to void liens on collateral consistent with Part 4 above:

Creditor	Collateral	Scheduled Debt	Total Collateral Value	Amount to be Deemed Secured	Amount to be Reclassified as Unsecured

**Part 8: Other Plan Provisions**

**a. Vesting of Property of the Estate**

- Upon Confirmation
- Upon Discharge

**b. Payment Notices**

Creditors and Lessors provided for in Parts 4, 6 or 7 may continue to mail customary notices or coupons to the Debtor notwithstanding the automatic stay.

**c. Order of Distribution**

The Standing Trustee shall pay allowed claims in the following order:

- 1) Ch. 13 Standing Trustee Commissions
- 2) Other Administrative Claims
- 3) Secured Claims
- 4) Lease Arrearages
- 5) Priority Claims

6) General Unsecured Claims

**d. Post-Petition Claims**

The Standing Trustee  is,  is not authorized to pay post-petition claims filed pursuant to 11 U.S.C. Section 1305(a) in the amount filed by the post-petition claimant.

**Part 9: Modification  NONE**

If this Plan modifies a Plan previously filed in this case, complete the information below.

Date of Plan being modified: \_\_\_\_\_.

Explain below **why** the plan is being modified: \_\_\_\_\_ | Explain below **how** the plan is being modified: \_\_\_\_\_

Are Schedules I and J being filed simultaneously with this Modified Plan?  Yes  No

**Part 10 : Non-Standard Provision(s): Signatures Required**

Non-Standard Provisions Requiring Separate Signatures:

NONE

Explain here:

As previously noted in Part 1c of this plan, the debtor/s will be requesting a loan modification of their mortgage through the Bankruptcy Court's Loss Mitigation Program.

The debtor/s are proposing to pay \$10,000.00 in arrears to Select Portfolio Servicing, Inc. through the Chapter 13 Plan.

The debtor/s will be making a Adequate Protection Payment of \$1,900.00 per month outside the plan to SPS Inc.

Any non-standard provisions placed elsewhere in this plan are ineffective.

**Signatures**

The Debtor(s) and the attorney for the Debtor(s), if any, must sign this Plan.

By signing and filing this document, the debtor(s), if not represented by an attorney, or the attorney for the debtor(s) certify that the wording and order of the provisions in this Chapter 13 Plan are identical to *Local Form, Chapter 13 Plan and Motions*, other than any non-standard provisions included in Part 10.

I certify under penalty of perjury that the above is true.

Date: August 18, 2018

/s/ Jamie M Fletcher

Jamie M Fletcher

Debtor

Date: August 18, 2018

/s/ Christopher S Fletcher

Christopher S Fletcher

Joint Debtor

Date August 18, 2018

/s/ S. Daniel Hutchison, Esq.

S. Daniel Hutchison, Esq. SH-6931

Attorney for the Debtor(s)

**Certificate of Notice Page 7 of 8**  
 United States Bankruptcy Court  
 District of New Jersey

In re:  
 Jamie M Fletcher  
 Christopher S Fletcher  
 Debtors

Case No. 18-26586-JNP  
 Chapter 13

**CERTIFICATE OF NOTICE**

District/off: 0312-1

User: admin  
 Form ID: pdf901

Page 1 of 2  
 Total Noticed: 23

Date Rcvd: Aug 20, 2018

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Aug 22, 2018.

db/jdb +Jamie M Fletcher, Christopher S Fletcher, 3 Carroll Court, Sicklerville, NJ 08081-4442  
 517708890 +Cambria Center LLC, Attn: President, Managing Partner, 501 Cambria Ave.,  
 Bensalem, PA 19020-7213  
 517708891 +Cohen Seglias Pallas, Re: Cambria Center LLC, 30 South 17th Street 19th FL,  
 Philadelphia, PA 19103-4010  
 517708895 +Fein Such Kahn & Shepard PC, Re: F-25783-17, 7 Century Drive, Suite 201,  
 Parsippany, NJ 07054-4609  
 517708896 +Financial Recoveries, 200 East Park Drive, Suite 100, Mount Laurel, NJ 08054-1297  
 517708897 +Jefferson Health, Att: Billing/Bankruptcy Dept., 111 South 11th Street,  
 Philadelphia, PA 19107-4824  
 517708898 +LaSalle Bank National, 135 South LaSalle Street in Chicago, Ill, Chicago, IL 60603-4820  
 517708899 +Mandees/Rai Credit, 285 Grand Avenue, Englewood, NJ 07631-4390  
 517708900 +Office of the Sheriff, ATTN Charles H Billingham Sheriff, Room 100 - Courthouse,  
 520 Market Street, Camden, NJ 08102-1300  
 517708901 Progressive, PO Box 7247-0311, Philadelphia, PA 19170-0311  
 517708902 +Progressive Insurance Company, PO Box 31260, Tampa, FL 33631-3260  
 517708904 Select Portfolio Servicing, 3815 S Decker Lake Drive, Salt Lake City, UT 84119  
 517708906 +The Loan Servicing Center, Customer Support Unit, PO Box 551170,  
 Jacksonville, FL 32255-1170  
 517708907 ++US BANK, PO BOX 5229, CINCINNATI OH 45201-5229  
 (address filed with court: U.S. Bank N.A., 80 S. 8th Street, Suite 224,  
 Minneapolis, MN 55402)

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

smg E-mail/Text: usanj.njbankr@usdoj.gov Aug 20 2018 23:41:24 U.S. Attorney, 970 Broad St.,  
 Room 502, Rodino Federal Bldg., Newark, NJ 07102-2534  
 smg +E-mail/Text: ustpreq03.ne.ecf@usdoj.gov Aug 20 2018 23:41:20 United States Trustee,  
 Office of the United States Trustee, 1085 Raymond Blvd., One Newark Center, Suite 2100,  
 Newark, NJ 07102-5235  
 517708889 +E-mail/Text: g20956@att.com Aug 20 2018 23:42:09 AT&T Mobility II LLC,  
 c/o AT&T Services Inc., Karen A. Cavagnaro - Lead Paralegal, One AT&T Way, Room 3A104,  
 Bedminster, NJ 07921-2693  
 517708892 +E-mail/Text: ned-collections\_bankruptcydocuments@comcast.com Aug 20 2018 23:42:05 Comcast,  
 c/o Bankruptcy Department, One Comcast Center, 1701 John F Kennedy Blvd.,  
 Philadelphia, PA 19103-2899  
 517708893 +E-mail/Text: bankruptcy\_notifications@ccsusa.com Aug 20 2018 23:42:30  
 Credit Collection Service, PO Box 607, Norwood, MA 02062-0607  
 517708894 E-mail/Text: bknotice@ercbpo.com Aug 20 2018 23:41:30 Enhanced Recovery Company, LLC,  
 PO Box 57547, Jacksonville, FL 32241-7547  
 517708905 +E-mail/Text: bankruptcy@sw-credit.com Aug 20 2018 23:41:25 SW Credit System L.P.,  
 4120 International Parkway, Suite 1100, Carrollton, TX 75007-1958  
 517708903 +E-mail/Text: jennifer.chacon@spservicing.com Aug 20 2018 23:42:41  
 Select Portfolio Servicing, Attn: Bankruptcy Department, PO Box 65250,  
 Salt Lake City, UT 84165-0250  
 517708908 +E-mail/Text: chegyi@winslowtownship.com Aug 20 2018 23:41:23 Winslow Township,  
 Attn: Tax & Utility Collector, 125 South Route 73, Braddock, NJ 08037-9422  
 TOTAL: 9

\*\*\*\*\* BYPASSED RECIPIENTS \*\*\*\*\*

NONE.

TOTAL: 0

Addresses marked '' were corrected by inserting the ZIP or replacing an incorrect ZIP.  
 USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

Addresses marked '++' were redirected to the recipient's preferred mailing address  
 pursuant to 11 U.S.C. 342(f)/Fed.R.Bank.PR.2002(g)(4).

**I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Aug 22, 2018

Signature: /s/Joseph Speetjens

District/off: 0312-1

User: admin  
Form ID: pdf901

Page 2 of 2  
Total Noticed: 23

Date Rcvd: Aug 20, 2018

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## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on August 18, 2018 at the address(es) listed below:

S. Daniel Hutchison on behalf of Debtor Jamie M Fletcher sdhteamlaw@outlook.com,  
backupcourt@outlook.com;sdhlawecf@gmail.com;sdhlawparal@outlook.com;r39026@notify.bestcase.com  
S. Daniel Hutchison on behalf of Joint Debtor Christopher S Fletcher sdhteamlaw@outlook.com,  
backupcourt@outlook.com;sdhlawecf@gmail.com;sdhlawparal@outlook.com;r39026@notify.bestcase.com  
U.S. Trustee USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 3